

June 28, 2008

Lauren Lien  
Christian Hilland  
Reports Analysis Division  
Federal Election Commission  
999 E. Street, NW  
Washington, DC 20463

Re: Hillary Clinton for President; FEC ID No. C00431569, Amended February Monthly Report (1/1/08-1/31/08)

Dear Ms. Lien and Mr. Hilland,

This is in response to your letter requesting additional information pertaining to the above-listed report of Hillary Clinton for President (the Committee ). You have requested additional information on the reattribution, redesignation, or refund of certain contributions that are so marked on this report. The Committee has reviewed the contributions noted by you and is providing the following information. An Amendment is being filed to correct or clarify aggregation, designation, and attribution where needed. The Committee will also provide a response under separate cover with a copy of additional information requested by you that cannot be filed electronically.

In some cases, the Committee found data entry errors as a part of its review, cure and notification process and made the needed corrections. Please note that the Committee continues to work on review and improving our data entry.

In several additional cases, the Commission has confused different contributors with the same name. The contributions from Abernethy R, Adler J, Bartolomei J, Berger D (4), Coleman P, DiGeronimo R, Ellen B, Elliott J, Emery J, Golstein M, Green J, Hull L, Lake K, Lee L, Lee A, Marshall J, Martin C, Martin M, Minor M, Moore E, Obrien A, Oleary R, Palmer D, Patel C, Paul T, Peyser P (NY different then DC) Reddy V, Reyes I, Richardson N, Silver I, Silverman N, Smith J, Stone M, Sullivan, Weiner M, Weiss B, Weiss D, Williams Carl, Wilson S are contributions from separate individuals, at different addresses, and with different occupations and employers.

A few contributions noted by you will be disclosed as refunded on the Committee s July Monthly Report. Although the Committee is diligent with regards to our review and of tracking excessive contributions these few contributions were inadvertently overlooked. During the Committee s ongoing effort to correctly and accurately aggregate the contributions made by an individual, occasional data entry errors occur. Upon discovery, the Committee takes immediate action to correct its records and makes every effort to correct the public record.

Please note that the Committee has always intended to fully comply with the sixty day reattribution and redesignation provision. Strict procedures are used by the Committee to ensure that all contributions are handled in a manner in full compliance with this and all other applicable provisions.

In addition you have requested information regarding the contribution from The Emiline Company. The Committee received written verification prior to the deposit that it was a partnership and not a corporation. The contribution is reported as such and attributed to Richard Licht.

You have also requested additional information on the refund made to Abe Sher. His contributions were itemized and reported, though the Commission may not have located them due minor discrepancies with the contributors name. His contributions were reported on 11/19/07 as Abe Shen.

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You have asked for additional information on several debts. As the Commission notes in the report instructions debts under 500 and less the 60 days do not need to be reported. All of the debts noted by the Commission, except one, are under the reporting threshold. Once the Committees debt to the vendor exceeds these limits the Committee then includes them as a debt owed. The Committee has already amended its Year End Report to make the correction.

With respect to the final item noted by you, when reimbursements to staff for travel have exceeded \$500, the Committee has, in fact, itemized on its Schedule B the related payments from staff to vendors when such payments have exceeded \$200 for the election cycle. The Committee has reviewed its travel reimbursements and will file an amendment to cover a handful of cases where additional itemization is found to be necessary.

You have also noted that, in some cases, the purposes for the Committee s debts to individuals for travel reimbursements on Schedule D is different from the purposes made for payments to those same individuals on Schedule B. There are two explanations for this. First, the expenditures actually made on Schedule B are, in fact, for different purposes, i.e., different obligations, than the amounts unpaid and owed on Schedule D. However, because it is the same individual who was paid and to whom the debt is owed, the payment is disclosed on Schedule D as a payment this period, even if it was for other purposes. In other words, the Committee may owe a staff member travel reimbursements, which are unpaid and a debt, while at the same time, paying that same person a salary, which is not part of the debt. Therefore, the purpose of the debt is different than the purpose of the expenditure. The Committee is of the understanding that the Commission required these expenditures to be included as payments this period even when for a different purpose.

The second reason that some of the purposes on Schedule D are different than the expenditure purposes on Schedule B is because the Committee more fully itemizes the purposes on Schedule B. Whereas the purpose on Schedule D may indicate travel, the full itemization of the expenditure on Schedule B may indicate travel, per diem, meal expense, and office supplies. This is due to the reporting software that the Committee uses for the debt purposes, which does not easily permit disclosure of multiple purposes on the Schedule D. The Committee will seek a correction to its reporting software and will endeavor to amend to clarify additional purposes on the Schedule D.

I hope this information is sufficient for your review. However, should you desire any additional information, please contact our Counsel, Eric Kleinfeld, at 202-293-1177.

Sincerely,

Shelly Moskwa  
Treasurer, Hillary Clinton for President

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